

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA, §  
§  
Plaintiff, §  
§  
v. § CRIMINAL NO. SA-24-CR-573-JKP  
§  
(1) FELIX RODRIGUEZ-VARGAS §  
§  
(2) EDWIN PELAYO, §  
§  
Defendants.

**BILL OF PARTICULARS FOR FORFEITURE OF PROPERTIES**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, and files the following Bill of Particulars for Forfeiture of Properties.

The Indictment (Doc. 24), returned on November 20, 2024, gave notice that the United States seeks the criminal forfeiture of certain properties pursuant to Title 18 U.S.C. § 934(a)(1)(A) and (B) and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c) from Defendants FELIX RODRIGUEZ-VARGAS and EDWIN PELAYO. Specifically, this Bill of Particulars seeks the criminal forfeiture of properties which are included herein.

The United States hereby gives notice that it seeks the criminal forfeiture of certain properties from the Defendants for the violations of Title 18 U.S.C. § 933(a)(2) and (3) as follows:

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
[See Fed. R. Crim. P. 32.2]

I.

**Firearm Violation and Forfeiture Statutes**

[Title 18 U.S.C. § 933(a)(2) and (a)(3) subject to forfeiture pursuant to  
Title 18 U.S.C. § 934(a)(1)(A) and (B)]

As a result of the criminal violations set forth in Counts One and Two, the United States

of America gives notice to the Defendants of its intent to seek the forfeiture of certain property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 934(a)(1)(A) and (B), which state:

**Title 18 U.S.C. § 934. Forfeiture and Fines.**

**(a) Forfeiture. --**

**(1) In general.** -- Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law--

- (A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and
- (B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation . . .

This Notice of Demand for Forfeiture includes, but is not limited to, the property described below.

**III.  
Property**

1. Sig Sauer handgun, SN: 66g340432
2. Glock handgun, SN: BAZR771
3. Short barrel H&K rifle, SN: 241409885
4. \$107,600 in United States Currency
5. Black GMC Sierra displaying Texas license plates 6495Y81; and
6. Any and all firearms, ammunition, and/or firearm accessories involved in or used in the commission of the criminal offense(s).

Respectfully submitted,  
MARGARET F. LEACHMAN  
Acting United States Attorney

By: /s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 3, 2025, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to counsel of record.

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/s/  
RAY A. GATTINELLA  
Assistant United States Attorney